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9 **Attorneys for Plaintiff**
10 **J & J Sports Productions, Inc.**

11 **UNITED STATES DISTRICT COURT**
12 **SOUTHERN DISTRICT OF CALIFORNIA**

13 **J & J Sports Productions, Inc.,**

14 **Plaintiff,**

15 **vs.**

16 **Kenneth James Randall, et al.**

17 **Defendant.**

18 **CASE NO. CV 08-0494 JAH (BLM)**

19 **STIPULATION OF DISMISSAL OF**
20 **PLAINTIFF'S COMPLAINT**
21 **AGAINST DEFENDANT KENNETH**
22 **JAMES RANDALL RICHARD ALLAN**
23 **WRIGHT, individually and d/b/a**
24 **TRIPLE CROWN PUB**

25 **IT IS HEREBY STIPULATED** by and between Plaintiff J & J SPORTS
26 PRODUCTIONS, INC. and Defendants KENNETH JAMES RANDALL and
27 RICHARD ALLAN WRIGHT, individually and d/b/a Triple Crown Pub, that the
28 above-entitled action is hereby dismissed **without prejudice** against KENNETH
JAMES RANDALL and RICHARD ALLAN WRIGHT, individually and d/b/a Triple
Crown Pub to the Court's jurisdiction to enforce the settlement agreement reached
between the Parties.

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1 **IT IS FURTHER STIPULATED** that provided no Party referenced above has
2 filed a motion to reopen this action by July 16, 2008, this Court shall *not* have
3 jurisdiction to set aside the dismissal and the dismissal shall be deemed to be **with**
4 **prejudice.**

5 This dismissal is made pursuant to Federal Rules of Civil Procedure 41(a)(1).
6 Each Party referenced-above shall bear its own attorneys' fees and costs.
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10 Dated: June 6, 2008



LAW OFFICES OF THOMAS P. RILEY, P.C.

By: Thomas P. Riley
Attorneys for Plaintiff
J & J SPORTS PRODUCTIONS, INC.

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16 Dated: 6/12/08



GARY NELSON, ATTORNEY AT LAW

By: Gary Nelson
Attorneys for Defendants
KENNETH JAMES RANDALL and
RICHARD ALLAN WRIGHT, individually and d/b/a
TRIPLE CROWN PUB

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22 **IT IS SO ORDERED:**
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25 Dated: _____

26 **The Honorable John A. Houston**
27 **United States District Court**
28 **Southern District of California**

PROOF OF SERVICE (SERVICE BY OVERNIGHT MAIL)

I declare that:

I am employed in the County of Los Angeles, California. I am over the age of eighteen years and not a party to the within cause; my business address is First Library Square, 1114 Fremont Avenue, South Pasadena, California 91030. I am readily familiar with this law firm's practice for collection and processing of correspondence/documents for mail in the ordinary course of business.

On June 6, 2008, I served:

**STIPULATION OF DISMISSAL OF PLAINTIFF'S COMPLAINT
AGAINST DEFENDANTS KENNETH JAMES RANDALL and
RICHARD ALLAN WRIGHT, individually and d/b/a TRIPLE CROWN
PUB**

On all parties in said cause by enclosing a true copy thereof in a sealed envelope with postage prepaid and following ordinary business practices, said envelope was duly mailed and addressed to:

Mr. Gary Nelson, Esquire
GARY NELSON, ATTORNEY AT LAW
121 Broadway, Suite 250
San Diego, CA 92101

Attorneys for Defendants

I declare under the penalty of perjury pursuant to the laws of the United States that the foregoing is true and correct and that this declaration was executed on June 6, 2008, at South Pasadena, California.

Dated: June 6, 2008

/s/ Terry Houston
TERRY HOUSTON